

Attorneys admitted in  
California, New York,  
Texas, Pennsylvania,  
Maine, and District of Columbia

Sender's contact:  
scott@donigerlawfirm.com  
(310) 590-1820



USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: December 16, 2020	
--	--

December 15, 2020

**DELIVERED VIA ECF**

Honorable Victor Marrero  
ChambersNYSDMarrero@nysd.uscourts.gov

**Case Title:** *Ferguson and Katzman Photography, Inc. v. Key Food Stores Co-Operative, Inc. et al; 1:20-cv-08854-VM*  
**Re:** **Request to Adjourn Initial Pretrial Conference**

Your Honor:


I represent Plaintiff in the above-referenced action. I write, with consent of Defendant Old Market Group Holdings Corp. f/k/a Fairway Group Holdings Corp., to respectfully request an adjournment of the Initial Pretrial Conference currently scheduled for December 22, 2020 at 11:00 a.m. This is the first request for an extension.

Plaintiff requests an adjournment for two reasons: 1) certain Defendants have not yet appeared or filed an answer; and 2) Plaintiff is engaged in settlement discussions with certain Defendants. An adjournment of the Initial Pretrial Conference would allow more time for the parties to continue negotiations. The requested extension would also provide the time necessary for Defendants to respond and allow all parties to participate in preparing the joint Rule 26(f) submissions, should the parties be unable to reach a resolution.

For these reasons, Plaintiff respectfully requests a 30-day adjournment of the Initial Pretrial Conference. We thank Your Honor for your consideration of this request.

Respectfully submitted,

By: /s/ Scott Alan Burroughs  
Scott Alan Burroughs  
DONIGER / BURROUGHS  
For the Plaintiff

<b>Request GRANTED.</b> The initial conference is hereby adjourned to January 29, 2021 at 1:30 p.m.
<b>SO ORDERED.</b> December 16, 2020 DATE
 VICTOR MARRERO, U.S.D.J.